



California Regional Water Quality Control Board

Central Coast Region



Winston H. Hickox

Secretary for
Environmental
Protection

Gray Davis
Governor

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October 18, 2002

Mr. Richard W. McClure
Olin Corporation
Environmental Remediation Group
PO Box 248
Charleston, TN 37310-0248

Dear Mr. McClure:

✓ 10/20/02 RG
C. A. Wheeler
for [unclear]
(via fax)
J. Young

RECEIVED
OCT 21 2002
**OLIN ENVIRONMENTAL
REMEDIATION GROUP**

**SLIC: 425 TENNANT AVENUE (OLIN SITE), MORGAN HILL; REQUEST TO IMPLEMENT
ADDITIONAL MONITORING FOR PERCHLORATE IN OFFSITE DOMESTIC SUPPLY WELLS
DOWNGRADIENT OF THE OLIN SITE**

Regional Board staff has reviewed results of the initial offsite domestic well sampling for perchlorate within one half mile and downgradient of the Olin site. The results show that some of the domestic wells contain perchlorate concentrations exceeding the 4 µg/l action level established by the California Department of Health Services. An action level is the level of contaminant in drinking water that is considered safe to people ingesting that water on a daily basis.

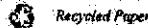
The offsite domestic well sampling program is part of an investigation to determine the extent of perchlorate contamination in groundwater coming from the Olin site. The Olin site was contaminated with perchlorate from its prior flare (marine, highway, and railroad) manufacturing operation that used potassium perchlorate as one of the ingredients of the ignition mix for the flares. The former manufacturing site is located at 425 Tennant Avenue (northeast corner of Tennant and Railroad Avenues), Morgan Hill.

We are very concerned with results of the initial offsite domestic well sampling showing perchlorate concentrations exceeding the action level in some wells. As you know, perchlorate affects human health by interfering with iodide uptake into the thyroid gland. Since iodide is an essential component of thyroid hormones, perchlorate disrupts how the thyroid functions. In adults, the thyroid helps to regulate metabolism. In children, the thyroid plays a major role in proper development in addition to metabolism. Impairment of thyroid function in expectant mothers may impact the fetus and newborn and result in effects including changes in behavior, delayed development, and decreased learning capability. Changes in thyroid hormone levels may also result in thyroid gland tumors. We understand the well owners and their tenants were informed of the perchlorate detection, were advised not to drink the water, and were provided with bottled drinking water paid for by Olin.

We require you to proceed with the immediate sampling of domestic wells (identified as Tier II wells) located within a one half mile to one-mile radius downgradient (south, southeast, and southwest) of the Olin site. These wells were identified in coordination with the Regional Board, Santa Clara Valley Water District, and Olin and its consultant. A list of these wells was compiled by your consultant, Law Engineering and Environmental Services, and submitted to us on October 9, 2002. We agree that sampling of some of these wells may not be necessary if perchlorate is not detected in adjacent upgradient wells screened at similar depths. As was the case with the initial offsite domestic well sampling, Olin will provide sampling and analysis for perchlorate at no cost to the well owners. If perchlorate is detected in any of the wells, Olin will provide treatment or an alternative water supply to the well owners and/or their tenants.

To expedite obtaining permission from the well owners, you proposed going door to door to ask for permission to sample their wells. You may show or send this letter to the well owners and their tenants to demonstrate that the Regional Board requests sampling of their wells to protect their health and to determine the extent of perchlorate groundwater contamination.

California Environmental Protection Agency



Mr. Richard McClure

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October 18, 2002

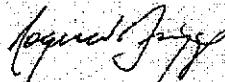
To keep us informed of the progress of investigation and remedial actions at the site, we require you to submit monthly status reports by the 10th of every month. The status report shall discuss initial, ongoing or completed activities during the reporting month and activities continuing into or projected to start in the succeeding months. The initial status report shall be submitted by November 10, 2002.

We request submittal of the status reports pursuant to Section 13267 of the California Water Code. The reason the Regional Board needs the status report is to ensure appropriate and timely reporting of the investigation and remedial activities at and in the vicinity of the subject site. The evidence that supports requiring Olin Corporation to provide the status report because it owns the site and previously operated the flare manufacturing facility. More detailed information is available in the Regional Board's public file on this matter.

Any person affected by this action of the Regional Board may petition the State Water Resources Control Board to review the action in accordance with Section 13320 of the California Water Code and Title 23, California Code of Regulations, Section 2050. The petition must be received by the State Board within 30 days of the date of this order. Copies of the law and regulations applicable to filing petitions will be provided upon request.

If you have any questions, please contact A. John Mijares at (805) 549-3696 or Harvey Packard at (805) 542-4639.

Sincerely,



Roger W. Briggs
Executive Officer

ajm/rwb/mjl request for tier 2 domestic well perchlorate investigation DocID02

cc:

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